

Gregory G. Spaulding, Esq. (SB# 106606)
Terry S. Sterling, Esq. (SB# 106379)
SPAULDING McCULLOUGH & TANSIL LLP
90 South E Street, Suite 200
P.O. Box 1867
Santa Rosa, CA 95402
Telephone: (707) 524-1900 / Facsimile: (707) 524-1906
spaulding@smlaw.com; sterling@smlaw.com

Attorneys for Defendants
SONOMA COUNTY SHERIFF'S DEPARTMENT,
BILL COGBILL and COUNTY OF SONOMA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

VALERIE GEORGE, as Administrator and
Personal Representative of THE ESTATE OF
RYAN GEORGE; VALERIE GEORGE and
TAJMAH BEAUCHAMP, as Legal
Representatives for Jaida George and Ryan
George, Jr.; VALERIE GEORGE, Individually;
DONALD GEORGE; and TAJMAH
BEAUCHAMP, Individually,

Plaintiffs,

vs.

SONOMA COUNTY SHERIFF'S
DEPARTMENT; BILL COGBILL; COUNTY
OF SONOMA; CALIFORNIA FORENSIC
MEDICAL GROUP, INC.; JAMES LUDERS,
M.D.; MICHAEL E. DAGEY, R.N.; SUTTER
HEALTH; SUTTER MEDICAL CENTER OF
SANTA ROSA; EDWARD W. HARD, M.D.;
RICHARD FLINDERS, M.D.; JOSEPH N.
MATEL, M.D.; NORICK JANIAN, M.D.; and
DOES 1 through 25, inclusive,

Defendants.

Case No.: 3:08-cv-02675-EDL

STIPULATION AND ~~[PROPOSED]~~ ORDER
ALLOWING DEFENDANTS COUNTY OF
SONOMA, SONOMA COUNTY SHERIFF'S
DEPARTMENT AND BILL COGBILL TO
FILE MEMORANDA OF POINTS AND
AUTHORITIES IN EXCESS OF 25 PAGES
IN LENGTH

Hon. Elizabeth D. Laporte

Defendants COUNTY OF SONOMA, SONOMA COUNTY SHERIFF'S DEPARTMENT
and BILL COGBILL intend to file two Motions for Summary Judgment or, in the Alternative,
Partial Summary Judgment (one Motion will be filed by COUNTY OF SONOMA and SONOMA
COUNTY SHERIFF'S DEPARTMENT (collectively, "the COUNTY") and a separate Motion will

1 be filed by BILL COGBILL). Plaintiffs allege ten causes of action against the COUNTY and
 2 fourteen causes of action against COGBILL. It is anticipated that the Memorandum of Points and
 3 Authorities that will be filed in support of each of the two Motions will exceed the 25 pages allowed
 4 by Local Rules 7-2(b) and 7-4(b). This additional space is necessary to fully argue the complex
 5 issues presented by the Third Amended Complaint. COUNTY and COGBILL cannot provide the
 6 Court with a full analysis of the issues subject to summary judgment or partial summary judgment,
 7 including a complete analysis of the law and facts pertaining thereto, in 25 pages. Defendants
 8 require additional space, of up to 10 additional pages for each of the two Memoranda that will be
 9 filed in support of two Motions. Therefore, pursuant to Local Rule 7-12:

10 IT IS HEREBY STIPULATED AND AGREED by and among the undersigned counsel that,
 11 subject to the Court's approval, the COUNTY and COGBILL may each file a Memorandum of
 12 Points and Authorities in support of their two separate Motions for Summary Judgment or, in the
 13 Alternative, Partial Summary Judgment (one Motion to be filed by the COUNTY and one Motion to
 14 be filed by COGBILL) of up to 35 pages in length.

15 DATED: July 23, 2010

SANFORD, WITTELS & HEISLER LLP
 Attorneys for Plaintiffs

18 By: /s/
 Steven L. Wittels, Esq.

20 DATED: July 23, 2010

SPAULDING McCULLOUGH & TANSIL LLP
 Attorneys for Defendants
 SONOMA COUNTY SHERIFF'S DEPARTMENT,
 BILL COGBILL and COUNTY OF SONOMA

24 By: /s/
 Terry S. Sterling, Esq.

1 DATED: July 23, 2010

TRIMBLE, SHERINIAN & VARANINI
Attorneys for Defendants
CALIFORNIA FORENSIC MEDICAL GROUP,
INC.; JAMES LUDERS, M.D. and MICHAEL E.
DAGEY, R.N.

5 By: /s/
Jerome M. Varanini, Esq.

7 DATED: July 23, 2010

HASSARD BONNINGTON LLP
Attorneys for Defendants
JOSEPH N. MATEL, M.D. and RICHARD
FLINDERS, M.D.

11 By: /s/
Joanna L. Storey, Esq.

12 DATED: July 23, 2010

LAFOLLETTE, JOHNSON, DEHAAS,
FESLER & AMES
Attorneys for Defendant
SUTTER MEDICAL CENTER OF SANTA ROSA

16 By: /s/
Larry Byron Thornton

18 DATED: July 23, 2010

ROGASKI, PREOVOLOS, WEBER &
PATTERSON, LLP
Attorneys for Defendant
NORICK JANIAN, M.D.

22 By: /s/
Chester A. Rogaski, Jr., Esq.

FILER'S ATTESTATION

Pursuant to General Order 45, section X.B regarding signatures, I hereby attest under penalty of perjury that concurrence in the filing of the document has been obtained for any signatures indicated by a "conformed" signature (/s/) within this e-filed document.

DATED: July 23, 2010

SPAULDING McCULLOUGH & TANSIL LLP
Attorneys for Defendants
SONOMA COUNTY SHERIFF'S DEPARTMENT,
BILL COGBILL and COUNTY OF SONOMA

By: /s/
Terry S. Sterling, Esq.

~~PROPOSED~~ ORDER

Based on the foregoing Stipulation, and good cause appearing therefore,

IT IS HEREBY ORDERED:

Defendants COUNTY OF SONOMA and SONOMA COUNTY SHERIFF'S DEPARTMENT (collectively, "the COUNTY"), and BILL COGBILL may each file a Memoranda of Points and Authorities in support of their separate Motions for Summary Judgment or, in the Alternative, Partial Summary Judgment (one Motion to be filed by the COUNTY and one Motion to be filed by COGBILL) of up to 35 pages in length.

Dated: July 26, 2010_____

